

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

NORCAST S.A.R.L.,

Plaintiff,

-against-

CASTLE HARLAN, INC.

Defendant.

Case No. 12 Civ. 4973 (PAC)

**NOTICE OF CROSS-  
MOTION TO REMAND**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Opposition to Defendant's Motion to Dismiss and in Support of Plaintiff's Cross-Motion to Remand, dated August 6, 2012, Norcast S.A.R.L. will move this Court before the Honorable Paul A. Crotty, U.S.D.J., for an order remanding this action to the Commercial Division of the New York Supreme Court, New York County, pursuant to 28 U.S.C. § 1447(c) and for lack of subject-matter jurisdiction, and granting Plaintiff reasonable costs and attorneys' fees incurred as a result of removal pursuant to 28 U.S.C. § 1447(c), and such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
August 6, 2012

CHADBOURNE & PARKE LLP

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